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Attorney for Plaintiff,
LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LIBERTY MEDIA HOLDINGS, LLC d/b/a)	Case No. 10-CV-1810-JLS-WMC
CORBIN FISHER)	
Plaintiff,)	DECLARATION OF ERIC GAPP IN
)	SUPPORT OF MOTION FOR DEFAULT
)	JUDGMENT AGAINST DEFENDANTS
vs.)	PORNILOVE.NET AND COREY
)	DEBARROS
PORNILOVE.NET, COREY DEBARROS,)	Hearing:
and JOHN DOES 3-1000)	Time:
)	Courtroom:
Defendants)	

I, Eric Gapp, declare under penalty of perjury that:

1. I am the Vice President of Intellectual Property Management for Plaintiff Liberty Media Holdings (Liberty).

2. Liberty produces and distributes high quality adult entertainment films using highly talented performers, directors, cinematographers, lighting technicians, set designers, editors, and web developers, and uses the high quality equipment every step of the way. It is the custom and practice to register each and every film with the United States Copyright Office.

3. Liberty has also registered the trademarks, CORBIN FISHER ® and EXCELSIOR PRODUCTIONS ®, each of which appear throughout the Works.

4. Additionally, each video, including the Works, released by Liberty contains a statement pursuant to 18 U.S.C. § 2257, which displays our trademark, CORBIN FISHER ®, the

1 title of the production, a statement that each model is over the age of 18, and that such age
2 records are kept at Plaintiff's San Diego, California address.

3 5. In December 2009, I became aware of the websites, www.pornilove.org and
4 www.pornilove.net, and began reviewing and monitoring the Pornilove blogs, Facebook page,
5 and Yahoo! group. During this review, I discovered various Liberty works being displayed and
6 distributed by Defendants. I documented a number of these infringements, regularly sent DMCA
7 notices of infringement out regarding these infringements to the blogs servers and other related
8 entities, and compiled a list of infringements.

9 6. A true and correct copy of the list infringements that I documented is attached to
10 this Motion as Exhibit 13.

11 7. True and correct copies of screenshots and/or printouts of the infringements
12 appear as Exhibit 14 to this Motion.

13 8. The sole purpose of the Pornilove network appears to be to unlawfully copy,
14 publish, and distribute the copyrighted works of others.

15 9. A comprehensive list of the Pornilove related blogs and sites which I was able to
16 locate appears in Paragraph 12 of this Motion. There were likely many other Pornilove blogs
17 which I never became aware of.

18 10. True and correct copyright certificates for each of the works listed appear as
19 Exhibit 15 to this Motion.

20 11. Plaintiff did not authorize Defendants to duplicate and display and/or distribute
21 any of its works, nor would Liberty ever contemplate doing so.

22 12. Online piracy, including the free distribution of Liberty's works by blogs such as
23 Pornilove, is one of the greatest threats faced by Plaintiff, and the adult entertainment industry as
24 whole.

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1 13. I have reviewed the time entries for work on this matter and believe that the rate
2 billed by Mr. Randazza are in line with someone of his experience and caliber and that the
3 amount of billable time spent on this matter is more than reasonable.

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5 Signed on July 19, 2011 in Las Vegas, NV.

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8 Eric Gapp
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on July 19, 2011. A copy of this motion has been sent via US Mail to Corey Debarros and Pornilove.net.

Dated: July 19, 2011

Respectfully submitted,

s/ Marc Randazza

Marc J. Randazza, SBN 269535

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